



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 4
ATLANTA FEDERAL CENTER
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ATLANTA, GEORGIA 30303-8960

September 4, 2007

J.R. Brown
Captain, U.S. Navy
Commanding Officer
Naval Air Station Key West
P.O. Box 9001
Key West, Florida 33040-9001

SUBJECT: Final Environmental Impact Statement for the Restoration of Clear Zones and Stormwater Drainage Systems at Boca Chica Field, Naval Air Station Key West, Florida; CEQ Number 20070319

Dear Captain Brown:

The U.S. Environmental Protection Agency (EPA) has reviewed the referenced Final Environmental Impact Statement (EIS) in accordance with its responsibilities under Section 309 of the Clean Air Act and Section 102(2)(C) of the National Environmental Policy Act. The U.S. Department of the Navy (Navy) proposes to restore clear zones and stormwater drainage systems at Boca Chica Field, Naval Air Station (NAS) Key West, located on Boca Chica Key in Monroe County, Florida. The proposed action includes the trimming and/or removal of vegetation that protrudes into vertically or laterally controlled airfield surfaces, clearing and grubbing, grading, filling low areas, replanting some areas with native salt marsh vegetation, and supplemental improvements to restore the function of drainage areas. Restoration methods will include the use of hand-clearing or mechanized methods (i.e., traditional construction equipment or specialized equipment). Maintenance methods will include mowing, hand-clearing, and prescribed burning, where feasible. These activities are necessary to ensure the safety of flight operations and to bring the airfield into compliance with Navy airfield criteria.

EPA's primary concern raised in the review of the Draft EIS was the loss of important wetland functions associated with conversion of mangroves to high salt marsh and maintainable wetlands. EPA recommended that the Final EIS include a more detailed discussion of the compensatory mitigation that will be utilized to replace some of the lost functions and values associated with mangrove conversion and a thorough discussion of the overall adaptive management plan. EPA appreciates inclusion of Appendix A, Monitoring and Mitigation Plan, in the Final EIS. There are several mangrove restoration mitigation projects proposed to offset the unavoidable losses in wetland function, essential fish habitat function, and smalltooth sawfish habitat as a result of the proposed action.

The Draft EIS also suggested that the project will be implemented in phases, relying on monitoring and adaptive management to allow for changes to the proposed action in the future. EPA recommended that the Final EIS include a thorough discussion of the overall adaptive

management plan, including a detailed monitoring protocol. EPA appreciates inclusion of the NAS Key West Natural Resources and Environmental Compliance Partnering Team as part of the overall adaptive management process for the build-out of the project. The team will serve as an integral source of information prior to design and construction for each phase of the project. The team will provide suggestions and input relative to the success of each phase based on the proposed monitoring plans for salt marsh conversion and LKMR population monitoring. Additionally, the partnering group will have the ability to provide input and help the Navy work towards the most environmentally sensitive option. EPA looks forward to participating on this important team.

EPA appreciates the response in the Final EIS that turbidity management and construction monitoring will be included in the Stormwater Pollution Prevention Plan (SWPPP). However, this monitoring commitment was not included in Appendix A and only referenced as part of a generic SWPPP (Appendix H) with no site-specific details regarding turbidity management for the overall NAS Key West restoration project. Without additional explanation in the Final EIS, EPA recommends inclusion of a commitment to include this monitoring protocol, along with the other conservation measures described above, in the Record of Decision for this project to ensure timely implementation.

Based on the additional mitigation measures and monitoring programs described in the Final EIS, EPA has no additional concerns related to this project. We appreciate the opportunity to review the proposed action. Please contact Ben West of my staff at (404) 562-9643 if you have any questions or want to discuss our comments further.

Sincerely,

A handwritten signature in black ink, appearing to read "Heinz Mueller", with a long horizontal flourish extending to the right.

Heinz J. Mueller, Chief
NEPA Program Office
Office of Policy and Management

cc: U.S. Army Corps of Engineers – Jacksonville District, Miami Regulatory Field Office